This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

Mil M Date 2/15/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

Sincerely

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 039 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DRAFT

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Ammunition Remains in EOCR Area

Site ID:

039

Operable Unit:

10-08

Waste Area Group: 10

I. Summary – Physical Description of the Site:

Site 039 consists of ammunition remains scattered in the area surrounding the former Experimental Organic Cooled Reactor (EOCR)/ Security Training Facility (STF). This site was identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description, collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are . The GPS coordinate system is listed as North American Datum 27.

Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Investigations revealed that ammunition debris covers outlying soil areas of the STF Gun Range. Debris includes expended shotgun shells, pistol cartridges, practice grenades, tear gas and smoke grenades, spent M-60 blanks, and other miscellaneous small weapons remnants. The STF are served as a training center for INEEL security helicopters and Special Response Team from 1983-1990. The area was cleaned up extensively in early 1990 when the facility was closed; however, some debris was left on the ground in outlying areas.

There is no evidence that the remaining debris poses a risk to human health or the environment. There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. An August 1991 radiological survey of surface soil in this area reported no radiological conditions present. There is no evidence of stained or discolored soil, or odors. The ground surface shows well-established vegetation with healthy native grasses and sagebrush. The description of the site conditions is based on recent investigations and interviews; with the exception of the radiological survey, no field screening or sample data exist for this site.

This site is located in the outlying areas of the STF Gun Range, and is not included as part of STF-02 in the Operable Unit (OU) 10-04 Remedial Investigation/Feasibility Study (RI/FS).

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with INEEL personnel, historical research, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 039 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility of contaminant levels at this site being above risk-based limits is remote. Field investigations of the ammunition debris and surface soil showed no evidence of hazardous constituents, stained soil, odors, fibrous materials, or other indications that contamination might be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides and other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY - Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, a radiological survey, interviews with personnel having knowledge of this area, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. Central Facilities Area (CFA) is the closest operating facility located approximately 2.5 miles northwest. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants. The EOCR Facility was abandoned in 1961 before it became operational, and the site was later used as the STF from 1983-1990. The remaining debris is highly unlikely to pose a risk to human health or the environment. This site is located in the outlying areas of the STF Gun Range, and is not included as part of STF-02 in the OU 10-04 RI/FS.

Signatures (1) enclos Tolley	
Prepared By: Marilyn Paarmann, WPI	DOE WAG Manager:
Approved By: Min Toler 9-30-04	Independent Review Of the Rene 9 29-09

Name: Kathleen Hain

DRAFI							DITA: 1
		DE	CISION ST (DOE R				
Date Received	1: 1/14/6	5					
Disposition:							
	s,te o	39 15	doterm	ined to	be .	no action	
Date: ///	4105			# Pages:	16		
Date. ///	1105		i '	ıı uycs.	10		

Signature: Zaldan E Hain

DECISION STATEMENT (EPA RPM) 5, 4e - 039	
Date Received:	
Disposition:	
EPA concurs that this is a	
no action site under CERCLA.	

Date:	9-23-04	# Pages: 16
Name:	Dennis Faulk	Signature Signature

Name:

DRAFI
DECISION STATEMENT (IDEQ RPM)
Date Received: May 8, 2002
Disposition:
Site 039
Site 039 consists of ammunition remains scattered around the former EOCR/STF, which is located about 2.5 miles southeast of CFA. The remains include expended (spent) small weapons ammunition such as shotgun shells and pistol shells as well as practice grenades, tear gas and smoke grenades, and M-60 blanks. There is no evidence of hazardous constituents nor are there any stained soils or odors and the vegetation is well established. A radiological survey in 1991 reported "no radiological conditions present." The State recommends this site for No Further Action.
Date: Agray /o 2004 # Pages:

Signature:

PROCESS/WASTE WORKSHEET	ORKSHEET	
SITE ID: 039	PROCESS:	Ammunition Remains in EOCR/STF Area
	WASTE:	Ammunition Remains
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Ammunition remains from STF training activities.	Abandoned spent ammunition from 1983-1990 STF training activities.	Artifact: Ammunition Remains
		Location: This site is located in the outlying areas of the former EOCR/STF.
		Description: Debris includes expended shotgun shells and pistol cartridges, practice grenades, tear gas and smoke grenades, spent M-60 blanks, and other miscellaneous small weapons remnants.

			tive Overall Reliability ment (high/med/	High
			Col 8 Qualitative Risk Assessment (high/med/	Pow
	n EOCR Area		Col 7 Risk-based Concentration	Not Applicable
	Ammunition Remains in EOCR Area	Ammunition Remains	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	None
	PROCESS:	WASTE:	Col 5 Potential Sources Associated with this Hazardous Material	Soil
CONTAMINANT WORKSHEET	SITE ID: 039		Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	None

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?		
Block 1	Answer:		
Investigations revealed that ammunition debris covers outlying soil areas of the STF Gun Range extending a distance of 600 ft north of the large berm and 50 ft out of the other three berms. Debris includes expended shotgun shells, pistol cartridges, practice grenades, tear gas and smoke grenades, spent M-60 blanks, and other miscellaneous small weapons remnants. The STF Gun Range served as a training center for the INEEL security helicopters and Special Response Team from 1983-1990. The area was cleaned up extensively in early 1990 when the facility was closed; however, some debris was left on the ground in outlying areas.			
The site is located within the boundaries of the INEEL, approximately 2 miles northwest of CFA, the nearest operating INEEL facility.			
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)		
Interviews with INEEL Environmental Restoration (ER) and security personnel revealed that the debris consists of ammunition remains from STF training activities. Materials found at the site are inert and pose no risk.			
Block 3	Has this INFORMATION been confirmed? ⊠ Yes □ No If so, describe the confirmation. (check one)		
Interviews, investigations, historical research of the EOCR/STF site, and photographs revealed the history of the site and present condition.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
No Available Information Anecdotal Historical Process Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data Disposal Data OA Data Disposal Data DAD Report Initial Assessment Well Data Construction Data			

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?			
Block 1	Answer:			
Ammunition debris covers outlying soil areas of the STF Gun Range extending a distance of 600 ft north of the large berm and 50 ft out from the other three berms. Debris includes expended shotgun shells, pistol cartridges, practice grenades, tear gas and smoke grenades, spent M-60 blanks, and other miscellaneous small weapons remnants.				
Interviews and historical research revealed that Site 039 contains ammunition remains from the former STF facility, which served as the INEEL Special Response Team training facility from 1983-1990. The site is located within the boundaries of the INEEL, approximately 2 miles northwest of CFA, the nearest operating INEEL facility.				
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)			
Interviews with INEEL personnel and site investigations revealed the nature and extent of the ammunition debris. Written documents provided the timeframe and history of the EOCR/STF operations. Photographs provide a description of the debris and present site conditions.				
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
This information was confirmed with interviews, site investigations, photographs, and historical research of past operations at the site.				
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)			
No Available Information Anecdotal Anecdotal Aistorical Process Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data Disposal Data QA Data Disposal				

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.		
Block 1	Answer:		
There is no evidence that a source exists at Site 039. There is no visual evidence of hazardous constituents, disturbed vegetation, or stained or discolored soil. Based on interviews, site investigations, a radiological survey, and historical research, the ammunition debris is inert, contains no radiological or hazardous constituents, and resulted from training activities during the 1983-90 timeframe.			
l			
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)		
	e investigations, radiological survey, and historical research of the STF area confirm sposes no risk to human health or the environment.		
Block 3	Has this INFORMATION been confirmed? ✓ Yes ✓ No If so, describe the confirmation. (check one)		
Interviews, sit the informatio	e investigations, a radiological survey, photographs, and historical research confirm n.		
are anomagon.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
	No Available Information		
Anecdotal Historical Pr			
Current Proc Photographs			
Engineering/	Site Drawings D&D Report		
Unusual Occ Summary Do	urrence Report		
•	Facility SOPs		

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?	
Block 1	Answer:	
There is no evidence of migration at Site 039. Site investigations revealed no visual evidence of hazardous constituents, disturbed, stained or discolored soil areas, or odors. The ammunition debris is old, weathered and includes expended shotgun shells and pistol cartridges, practice grenades, tear gas and smoke grenades, and spent M-60 blanks. There is no evidence that any type of hazardous materials were abandoned there.		
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
that the debri	investigations, interviews, historical documents, and a radiological survey revealed s consists of old ammunition remains. Photographs revealed the types of ammunition ite conditions.	
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)	
This informati photographs.	on was confirmed through site investigations, historical research, interviews, and	
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
No Available Information Analytical Data Anecdotal Historical Process Data Current Process Data Photographs Engineering/Site Drawings Unusual Occurrence Report Summary Documents Facility SOPs Other Analytical Data Documentation about Data OLIPHONE DATA Disposal Data QA Data DAT		

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?		
Block 1	Answer:		
There is no expected pattern of potential contamination because there is no evidence of hazardous materials at the site. There is no evidence of stained or discolored soil in the area, odors or visual evidence of disturbed vegetation. Based on interviews, historical research of the STF area, and a radiological survey, there is no reason to suspect hazardous or radioactive constituents are present at this site.			
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)		
This information was obtained from site investigations, historical documents, a radiological survey, interviews with INEEL personnel, and photographs taken during the investigations.			
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)			
This information was confirmed through interviews, site investigations, photographs and historical research.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
Anecdotal Historical Production Current Production Photographs Engineering	Cess Data QA Data S		

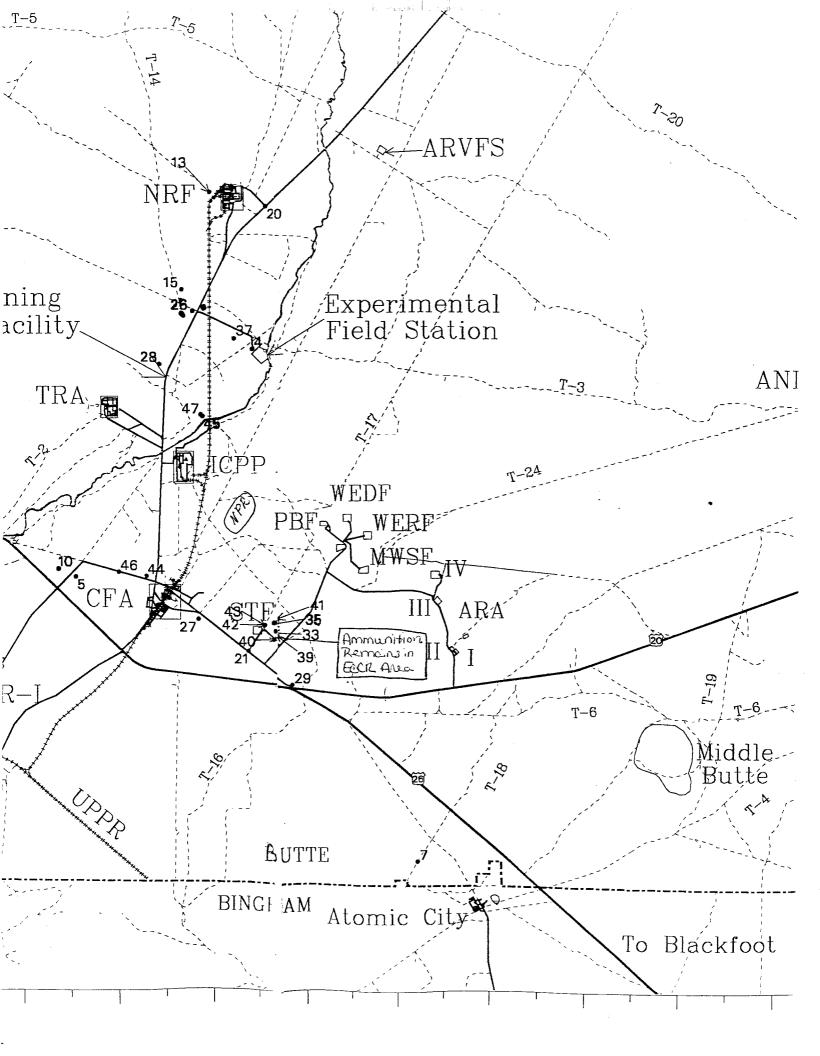
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.
Block 1	Answer:
old, weathere ft north of the the ammunition	vidence that a source exists at this site. Investigations and photographs indicate that d ammunition remains are scattered in the outlying areas of the STF Gun Range ~600 large northern berm and 50 ft out from the other three berms. Nothing indicates that on debris contains radioactive or hazardous constituents that would pose a risk to or the environment.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
interviews. Pl	ion was obtained from a radiological survey, site investigations, historical research and notographs show the type of debris and present site condition. The vegetation appears ablished, and there is no evidence of stained or discolored soil indicating the presence constituents.
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)
	ion was confirmed through a radiological survey, site investigations, interviews, and historical research.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
Anecdotal Historical Procurent Proc Photographs Engineering	cess Data QA Data S

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.
Block 1	Answer:
is no evidence resulting from pistol cartridg miscellaneous	d quantity of hazardous substances/constituents at this site is near zero because there e of hazardous or radioactive materials. The site consists of ammunition remains training activities at the STF. Scattered debris includes expended shotgun shells and es, practice grenades, tear gas and smoke grenades, spent M-60 blanks, and other is small weapons remnants. There is no evidence that the debris presents a risk to or the environment.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
past operation	on was obtained from a radiological survey, interviews with personnel familiar with his at the EOCR/STF, historical documents, and photographs of the area. None ence of hazardous or radiological constituents.
Block 3	Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)
	on was confirmed through a radiological survey, interviews, site investigations, and historical research.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	Documentation about Data Disposal Data Disposal Data Disposal Data DA

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.
Block 1	Answer:
action at this grenades, tea weapons rem Neither is the been dispose	vidence that a hazardous substance or constituent is present at levels that require site. The debris includes expended shotgun shells and pistol cartridges, practice or gas and smoke grenades, spent M-60 blanks, and other miscellaneous small mants determined to be old, weathered, inert, and highly unlikely to pose a risk. The visual evidence of hazardous constituents, nor evidence that waste has recently do f at this site. There is no evidence of stained or discolored soil, or odors. The see shows well-established vegetation with healthy native grasses and sagebrush.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
operations, a	on is based on interviews, site investigations, historical documents of EOCR/STF past and photographs of the area. The site shows no soil staining or discoloration, or isturbed vegetation.
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)
	on was confirmed through a radiological survey, site investigations, historical nterviews and photographs.
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	Documentation about Data Disposal Data Disposal Data Disposal Data DA DA

REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6, 2001.
- 3. Photographs of Site 039: PN99-0494-1-4, PN99-0494-1-7, PN99-0494-1-10.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Decision Documentation Package Track 1 for the Security Training Facility (STF) Gun Range, Operable Unit 10-04, STF-02, June 1999.
- 6. Radiological Control Survey Form, EOCR, August 27, 1991.



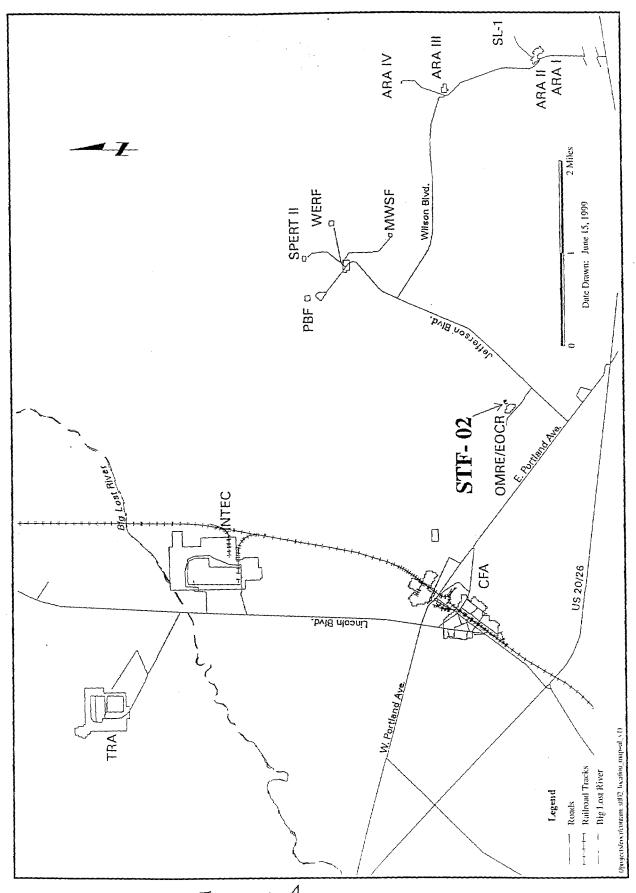


FIGURE 1.

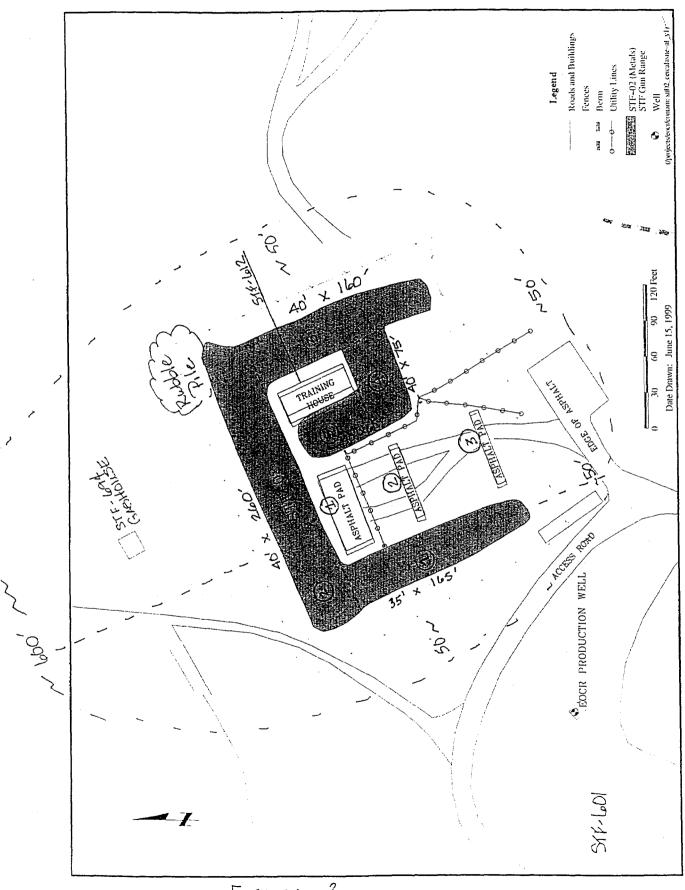


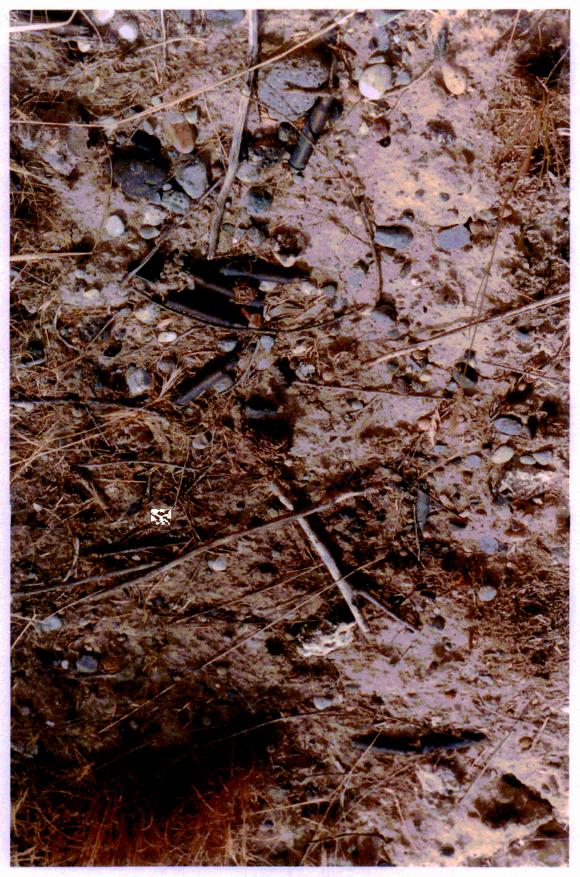
FIGURE 2.

Attachment A

Photographs of Site #039



Site: 039 Ammunition Remains in EOCR Area PN99-0494-1-4



Site: 039 Ammunition Remains in EOCR Area PN99-0494-1-7



Site: 039 Ammunition Remains in EOCR Area PN99-0494-1-10

Attachment B

Supporting Information for Site #039

435.36 04/14/99 Rev. 03

NEW SITE IDENTIFICATION

Par	t A – To Be Completed By Observer	
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324
2.	Site Title: 039, Ammunition Remains in EOCR Area	
3.	Describe the conditions that indicate a possible inactive or unreported we condition, amount or extent of condition and date observed. A location is survey points or global positioning system descriptors shall be included names or location descriptors for the waste site.	nap and/or diagram identifying the site against controlled
	The area around the EOCR/STF buildings and pond areas has many an for several years. During the August 1999 site visit, items observed incliparts, tear gas bomb remains, smoke bomb remains, M-60 fuse, etc. The reference number for this site is 039 and can be found	uded fired shotgun shells, fired pistol cartridges, grenade le GPS coordinates of the site are
Par	rt B – To Be Completed By Contractor WAG Manager	
4.	Recommendation:	
	This site meets the requirements for an inactive waste site, requires FFA/CO Action Plan. Proposed Operable Unit assignment is recom WAG:	investigation, and should be included in the INEEL imended to be included in the FFA/CO. erable Unit:
	This site DOES NOT meet the requirements for an inactive waste sincluded in the INEEL FFA/CO Action Plan.	te, DOES NOT require investigation and SHOULD NOT be
5.	Basis for the recommendation:	
	The conditions that exist at this site indicate the potential for an inactive or Disturbance of Suspected Inactive Waste Sites.	waste site according to Section 2 of MCP-3448 Reporting
	The basis for recommendation must include: (1) source description; (2 concern; and (4) descriptions of interfaces with other programs, as applied	exposure pathways; (3) potential contaminants of cable (e.g., D&D, Facility Operations, etc.)
6.	Contractor WAG Manager Certification: I have examined the proposed believe the information to be true, accurate, and complete. My recomm	site and the information submitted in this document and endation is indicated in Section 4 above.
Na	me: Signature:	Date:



PROJECT DOCUMENT REVIEW RECORD

DOCUMENT TITLE/DESCRIPTION:	RIPTION:	Site 039 Track 1 Decision Documentation Package, OU 10-08:	Decision Documentation Package, OU 10-08: Ammunition Remains in EOCR Area (DOE/ID
	-	10948)	
DATE: April 3, 2002	REV	REVIEWER: DEO	
ITEM SECTION NUMBER NUMBER	PAGE NUMBER	COMMENT	RESOLUTION
COMMENTS			
	Page 8, Block 2	Page 8, Block 2 refers to the STF ammunition remains as "industrial in nature" Does this term accurately define these materials. Please verify the use of this term.	Comment incorporated. In this context, "industrial" meant that the material has its origin in INEEL activities; however, since that was previously established and the use of the term "industrial" might cause confusion, we have deleted it.